

EXHIBIT E

Konstantin Walmsley, M.D.

1 IN THE UNITED STATES DISTRICT COURT
 FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
 2 CHARLESTON DIVISION

3 -----
 IN RE ETHICON, INC., PELVIC :Master File NO.
 4 REPAIR SYSTEM PRODUCTS :2:21-MD-02327
 LIABILITY LITIGATION :
 5 :MDL 2327
 THIS DOCUMENT RELATES TO THE :
 6 FOLLOWING CASE IN WAVE 2 OF :
 MDL 200 :
 7 -----
 PAMELA BAILEY AND :
 8 HOUSTON BAILEY, :
 :JOSEPH R. GOODWIN
 9 Plaintiffs, :U.S. DISTRICT JUDGE
 v. :
 10 :
 ETHICON, INC., et al., :
 11 :Case No.
 Defendants. :2:12-CV-01700

12 -----
 13 June 6, 2016

14
 15 Videotaped deposition of
 16 KONSTANTIN WALMSLEY, M.D., held at COURTYARD
 17 MARRIOTT WEST ORANGE, 8 Rooney Circle, West
 18 Orange, New Jersey, before Margaret M. Reihl,
 19 RPR, CCR, CRR, CLR and Notary Public, on the
 20 above date, commencing at 10:59 a.m.

21
 22 GOLKOW TECHNOLOGIES, INC.
 23 877.370.3377 ph | 917.591.5672 fax
 deps@golkow.com
 24

Konstantin Walmsley, M.D.

1 (Document marked for identification as
2 Walmsley-Bailey Deposition Exhibit No. 2.)

3 BY MR. GRIFFIN:

4 Q. I'm going to show you what was marked as
5 Exhibit 2 and make sure I haven't drawn all over it.

6 I'm going to show you what's marked as
7 Exhibit 2. Could you identify that?

8 A. Yes. This is a Rule 26 expert report on
9 Pamela Bailey.

10 Q. Did you -- is that your report?

11 A. Yes, sir.

12 Q. Did you draft it?

13 A. I did.

14 (Document marked for identification as
15 Walmsley-Bailey Deposition Exhibit No. 3.)

16 BY MR. GRIFFIN:

17 Q. Okay. I'm going to show you Exhibit 3
18 and ask if you can identify that?

19 A. This is my independent medical
20 examination of Pamela Bailey dated May 3rd, 2016.

21 Q. Okay. Dr. Walmsley your report
22 indicates the various medical records you reviewed.
23 Did you review any depositions?

24 A. Yes, I did.

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1 scarring with any SUI procedure, surgical procedure?

2 A. To some degree.

3 Q. In your Case Specific Opinion Number 2,
4 you indicate the various causes of dyspareunia that you
5 rule in and rule out, true?

6 A. Yes.

7 Q. I want to ask you, what is your
8 understanding of when the dyspareunia was worse, after
9 Dr. Perlow's surgery, after Dr. Adam's surgery, or has
10 it remained the same?

11 A. When I interviewed the patient, she
12 started having dyspareunia about three months after her
13 2001 surgery.

14 Q. Has it remained the same or was it
15 better or worse as a result of the surgery by Dr. Adam?

16 A. Dr. Adam's surgery was not -- certainly
17 not curative of the problem, and I'm not convinced it
18 changed very much with it.

19 Q. How often were they having sex before --
20 or after Dr. Perlow's surgery? Was it your
21 understanding they were unable to or could not?

22 A. I asked her that question specifically
23 when I examined her, and she claimed that she used to
24 be sexually active every day. When I examined -- when

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1 I discussed this with her in April -- pardon me -- in
2 May of 2016, she described being sexually active every
3 three to four months with pain.

4 Q. Do you know how often she was having it
5 after Dr. Perlow's surgery before Dr. Adam's surgery?

6 A. Somewhere between three to four times a
7 year and every day. I don't recall the exact amount.

8 Q. That's a pretty big gap.

9 A. I know it is. I apologize.

10 Q. Was it your understanding after
11 Dr. Perlow's surgery, she was not sexually active due
12 to dyspareunia?

13 A. Well, I do recall that, yes.

14 Q. She certainly was not having sex two to
15 three times a week after Dr. Perlow's surgery, true?

16 A. No, that's true.

17 Q. Because if she was having sex two to
18 three times a week after Dr. Perlow's surgery, that's
19 inconsistent with dyspareunia, correct?

20 MR. THOMPSON: Object to the form.

21 THE WITNESS: I'm not sure if I
22 understand that question.

23 BY MR. GRIFFIN:

24 Q. If she was having sex two to three times